

February 6, 2006

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: CPNI Certification for ACS Long Distance, Inc.
EB Docket No. 06-36/EB-06-TC-060

Dear Secretary Dortch:

Enclosed please find the ACS Long Distance, Inc.'s compliance certificate for the most recent period, along with an accompanying statement explaining how operating procedures ensure compliance with section 64.2009(e) of the Commission's rules.

Please call Lisa Phillips, Manager, Regulatory Affairs, at (907) 297-3130.

Sincerely,

ACS Long Distance, Inc.



Lisa Phillips
Manager, Regulatory Affairs

Enclosures

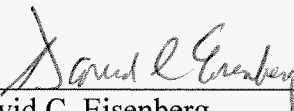
ACS of Long Distance, Inc.

Certification of CPNI Filing

I, David C. Eisenberg, serve as Senior Vice President Corporate Strategy and Development of ACS of Long Distance, Inc., a provider of U.S. telecommunications services.

Pursuant to Section 64.2009(e) of the rules of the Federal Communications Commission ("FCC"), 47 C.F.R. § 64.2009(e), I hereby certify that I am responsible for compliance with the FCC's customer proprietary network information ("CPNI") rules, 47 C.F.R. §§64.2001-2009, and Section 222 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. §222, and I have personal knowledge that, for the period January 1, 2005 to December 31, 2005, ACS of Long Distance, Inc. was in compliance with those rules.

As indicated in the accompanying statement, ACS of Long Distance's operating procedures ensure that the company is in compliance with the FCC's CPNI rules and Section 222 of the Act.



David C. Eisenberg
Senior Vice President Corporate Strategy and Development

Dated January 3, 2006.

ACS of Long Distance, Inc.

**Statement Explaining Compliance with CPNI Rules
for 2005**

ACS of Long Distance, Inc. has the following practices and procedures in place to ensure compliance with the customer proprietary network information (“CPNI”) rules of the Federal Communications Commission (“FCC”), 47 C.F.R. §§64.2001-2009, and Section 222 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. §222.

- We have implemented safeguards to ensure that the status of a customer’s CPNI approval (or absence of approval) is confirmed before CPNI is used in any marketing efforts. *See* 47 U.S.C. § 64.2009(a).
 - We regularly train personnel regarding the permissible use of CPNI, have adopted written CPNI policies which are available to employees, and have supervisory and disciplinary processes in place to address any violations of the CPNI rules. *See id.* § 64.2009(b).
 - We maintain records of any marketing campaigns that make use of CPNI and any instances where CPNI is disclosed, provided, or made available to third parties. *See id.* § 64.2009(c).
 - We have a supervisory review process to ensure compliance with CPNI rules in any outbound marketing campaign. *See id.* § 64.2009(d).
 - We retain records of compliance for at least the minimum time periods specified in Part 64 of the FCC’s rules.
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